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*Attorneys for Plaintiff  
United States for the Use and Benefit of  
Agate Steel, Inc. and Agate Steel, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES FOR THE USE  
AND BENEFIT OF AGATE STEEL,  
INC.; AGATE STEEL, INC., an  
Arizona Corporation,

Plaintiffs,

-vs-

JAYNES CORPORATION, a Nevada  
corporation; WESTERN SURETY  
COMPANY, a South Dakota  
corporation,

Defendants.

JAYNES CORPORATION, a New  
Mexico corporation,

Third-Party Plaintiff,

vs.

AMERICAN STEEL  
CORPORATION, a Nevada  
corporation; THE OHIO CASUALTY  
INSURANCE COMPANY, a foreign  
corporation,

**No. 2:13-cv-01907-APG-NJK**

**STIPULATION AND  
ORDER FOR CERTAIN RESPONSE  
AND REPLY DATES AS TO  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT AGAINST  
JAYNES CORPORATION AND  
WESTERN SURETY COMPANY**

**(Assigned to Judge Andrew P. Gordon and  
Magistrate Judge Nancy J. Koppe)**

1 \_\_\_\_\_ )  
2  
3 The parties, through counsel, stipulate as to the following. The parties request the  
4 Court to allow:

- 5 • Jaynes Corporation and Western Surety Company until August 7, 2015 to  
6 respond to Plaintiff Agate Steel, Inc.'s Motion For Summary Judgment  
7 Against Jaynes Corporation and Western Surety Company, and  
8 • Agate Steel, Inc. until August 24, 2015 to file a reply thereto.

10 This request was initiated by counsel for Plaintiff, who has a pre-planned commitment to  
11 prepare for and take the Hawaii Bar Exam. Subsequent to taking the bar exam, counsel  
12 for Plaintiff will be staying several additional days in Hawaii. Due to the timing of  
13 Defendants' response, the undersigned would have to prepare a reply during these time  
14 periods.  
15

16  
17 The dispositive motion deadline is August 20, 2015. This continuation will not  
18 impact or delay that deadline.

19  
20 Wherefore, the parties request that the Court allow the following:

- 21 • Jaynes Corporation and Western Surety Company until August 7, 2015 to  
22 respond to Plaintiff Agate Steel, Inc.'s Motion For Summary Judgment  
23 Against Jaynes Corporation and Western Surety Company, and  
24 • Agate Steel, Inc. until August 24, 2015 to file a reply thereto.

25  
26 **SO ORDERED.**

27 Dated: July 2, 2015.

28   
UNITED STATES DISTRICT JUDGE

1 DATED this 2<sup>nd</sup> day of July, 2015.

2  
3 **LAW OFFICES OF TIMOTHY D. DUCAR, PLC**

4 By /s/ Timothy D. Ducar  
5 Timothy D. Ducar  
6 P.O. Box 72645  
7 Phoenix, Arizona 85050  
8 Attorneys for Plaintiff  
9 **SNELL & WILMER, L.L.P.**

10 By /s/ Robin E. Perkins (with permission)  
11 Leon F. Mead II, Esq.  
12 Robin E. Perkins, Esq.  
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14 3883 Howard Hughes Parkway, Suite 1100  
15 Las Vegas, Nevada 89169  
16 Attorneys for Jaynes Corporation and  
17 Western Surety Company

18 **CHEIFETZ IANNITELLI MARCOLINI, P.C.**

19 By /s/ Claudio Eduardo Iannitelli (with permission)  
20 Claudio Eduardo Iannitelli, Esq.  
21 Cheifetz Iannitelli Marcolini, P.C.  
22 111 West Monroe Street, 17<sup>th</sup> Floor  
23 Phoenix, AZ 85003  
24 Attorneys for American Steel

25 **ORDER**

26 IT IS SO ORDERED.

27 Dated this \_\_\_\_\_ day of July, 2015.

28 \_\_\_\_\_  
U.S. District Court Judge

Respectfully submitted by:

26 By /s/ Timothy D. Ducar  
27 Timothy D. Ducar  
28 P.O. Box 72645  
Phoenix, Arizona 85050  
Attorneys for Plaintiff